

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

|                                    |   |                        |
|------------------------------------|---|------------------------|
|                                    |   |                        |
| CONSTANCE ALEXANDER, <i>et al.</i> | ) |                        |
|                                    | ) |                        |
| Plaintiff,                         | ) | CASE NO. 1:20-CV-00038 |
|                                    | ) |                        |
| v.                                 | ) |                        |
|                                    | ) |                        |
| STEADFAST INSURANCE COMPANY,       | ) | JURY TRIAL DEMANDED    |
| <i>et al.,</i>                     | ) |                        |
|                                    | ) |                        |
| Defendants.                        | ) |                        |
|                                    | ) |                        |

**DEFENDANT STEADFAST INSURANCE COMPANY'S NOTICE OF  
DEPOSITION OF PLAINTIFF CONSTANCE ALEXANDER**

**TO: TAMARA CHARLES**  
Clerk of the Superior Court  
Division of St. Thomas\St. John  
P.O. Box 70  
St. Thomas, VI 00804

## COUNSEL OF RECORD

**PLEASE TAKE NOTICE** that pursuant to V.I.R.Civ.P 26 and 30, Attorney for Defendant, **STEADFAST INSURANCE COMPANY**, (“Defendant”) will take the oral examination of Plaintiff **CONSTANCE ALEXANDER** on **Tuesday, November 21, 2023 at 10:30AM** via Zoom Videoconferencing at The Law Office of W. Mark Wilczynski, P.C., 48 Kongens Gade, St. Thomas, V.I. 00802, Telephone (340) 774-4547. The link to the Zoom Videoconferencing will be provided prior to the deposition.

This deposition will be recorded stenographically before a notary public or other duly authorized officer and will continue until completed. You are required to have the deponent

Alexander, et al. vs. Steadfast Insurance Company, et al.  
Civil No.: 1:20-CV-00038  
Defendant Steadfast Insurance Company's Notice of Deposition of  
Plaintiff, Constance Alexander

present at the noted date, time and place and to have with her, driver's license, social security card, and passport.

This deposition is being taken for use as evidence and/or trial purposes and may be continued from day to day until completed.

DATED: November 6, 2023

Respectfully submitted,

/s/ W. Mark Wilczynski

**W. MARK WILCZYNSKI, ESQUIRE**

Law Office of W. Mark Wilczynski, P.C.

*Attorney for Defendant:*

***Steadfast Insurance Company***

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V.I. Bar No. 515

### **CERTIFICATE OF SERVICE**

**IT IS HEREBY CERTIFIED** that on this 6<sup>th</sup> day of November 2023, I caused a true and correct copy of the foregoing **DEFENDANT STEADFAST INSURANCE COMPANY'S NOTICE OF DEPOSITION OF PLAINTIFF CONSTANCE ALEXANDER** to be served via electronic mail on:

**LEE J. ROHN, ESQ.**

**JENNIFER SUE KOOCKOGEY, ESQ.**

1101 Kings Street

Christiansted, St. Croix

U.S Virgin Islands 00820

Emails: [lee@rohnlaw.com](mailto:lee@rohnlaw.com)

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***Attorneys for Plaintiffs***

By: /s/ W. Mark Wilczynski